

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	
Romeo Iusco and	)	Judge Jacqueline P. Cox
Monica Iusco	)	
	)	
Debtors and Debtors in Possession.)	)	Case No. 09-41945
	)	
	)	Hearing: June 14, 2011 at 9:30 a.m.

**NOTICE OF MOTION**

To: See attached service list

PLEASE TAKE NOTICE that I will appear on June 14, 2011 at 9:30 a.m. before the Honorable Jacqueline P. Cox, or any other Judge sitting in her stead, in Courtroom 619, Dirksen Federal Building, 219 S. Dearborn St., Chicago, IL, and will then and there present the **Final Application for Interim Compensation for Professional Services and for Reimbursement of Expenses of Forrest L. Ingram, P.C., attorneys for the Debtors and Debtors in Possession**, and request entry of orders in accordance with these applications, at which time and place you may appear and be heard.

/s/ Forrest L. Ingram  
One of the Debtors' attorneys

Forrest L. Ingram, P.C.  
Forrest L. Ingram #3129032  
79 W. Monroe St., Suite 900  
Chicago, IL 60603  
(312) 759-2838

**CERTIFICATE OF SERVICE**

I, Jack O'Connor, an attorney, certify that I caused a true and correct copy of the above and foregoing Notice and the document to which it refers, on all parties entitled to service, by electronic filing through ECF, or by U.S. mail, as set forth on the attached service list, at or before 5:00 p.m. on May 23, 2011.

/s/ Jack O'Connor

Service List

Via CM/ECF

**Patrick S. Layng**

Office of the U.S. Trustee, Region 11  
219 S. Dearborn St., Room 873  
Chicago, IL 60604  
USTPRegion11.ES.ECF@usdoj.gov

**US Bank N.A.**

c/o Edmond M. Burke, Francisco Connell  
Chuhak & Tecson, PC  
30 S. Wacker Drive Suite 2600  
Chicago, IL 60606  
eburke@chuhak.com

**Alex Johnson, Ann Matthew, Mitesh Patel, Mukesh Sharma**

c/o Lester A Ottenheimer, III  
Ottenheimer Teplinsky & Rosenbloom,  
LLC  
750 Lake Cook Rd - Ste 140  
Buffalo Grove, IL 60090  
lottenheimer@otrlaw.com

**Devon Bank**

c/o Ernest D Simon; Francisco Connell  
105 W. Adams St. Ste. 1400  
Chicago, IL 60603  
esimon@erniesimon.com

---

Via U.S. Mail

**Romeo Iusco and Monica Iusco**

**Debtors and Debtors in Possession**  
8651 Harms Rd.  
Skokie, IL 60077

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	
ROMEO IUSCO and	)	Judge Jacqueline P. Cox
MONICA IUSCO	)	
	)	
Debtors and Debtors in Possession.)	)	Case No. 09-41945
	)	
	)	Hearing: June 14, 2011 at 9:30 a.m.

**FINAL APPLICATION FOR COMPENSATION FOR PROFESSIONAL SERVICES AND REIMBURSEMENT OF  
EXPENSES OF FORREST L. INGRAM, P.C.  
ON BEHALF OF ROMEO AND MONICA IUSCO**

Forrest L. Ingram, P.C. ("Applicant"), on behalf of its attorneys, duly appointed counsel for Debtors and Debtors in Possession Romeo Iusco and Monica Iusco ("Debtors"), hereby makes its Final application for interim compensation ("Application") pursuant to section 331 of the United States Bankruptcy Code and Rule 2016 and Local Rule 607 and requests that this Honorable Court enter an order allowing compensation for legal services rendered and reimbursement of expenses incurred from March 1, 2011 through March 31, 2011. In support of this Application, Applicant states as follows:

1. On November 4, 2009, Debtors entered into an engagement agreement with Applicant for a Chapter 11 case.
2. On November 5, 2009, Applicant filed, on Debtors' behalf, the petition for relief under Chapter 11, Case No. 09-41945.
3. On December 1, 2009, the Court entered an order in this case allowing employment of Applicant as Debtors' attorneys, retroactive to November 4, 2009. A copy of the order is attached here as **Exhibit A**.

4. On March 31, 2011, the Court entered an order confirming the Debtors' Plan of reorganization. Therefore, this application of services redereed up to that date.
5. Applicant has performed numerous legal services for the Debtors thus far in this case. The times and chronology of the Applicant's services rendered in the above-entitled proceedings for the period from March 1, 2011 through March 31, 2011, are scheduled in detail to the tenth of an hour and arranged *by natures* in **Exhibit B**, attached hereto. A copy of Exhibit B has been sent to the Debtors with a request for review of the details, and for objection, if any. The Debtors have not objected to any items listed, to any of the services rendered, nor to any of the fees requested.
6. Applicant's billing detail, arranged *by attorneys*, is attached as **Exhibit C**.
7. A brief description of the credentials of each employee of Forrest L. Ingram, P.C. for whom compensation is sought is attached as **Exhibit D**.
8. All services for which compensation is requested were in connection with these bankruptcy proceedings. All services performed after the commencement of the above-entitled proceedings were in connection with the performance of duties of the Debtors and Debtors in Possession as prescribed by the Bankruptcy Code or pursuant to orders of this Court.
9. Applicant requests the allowance of payment of compensation for legal services during the period March 1, 2011 through March 31, 2011 in the sum of **\$4,738.50**.  
  
Applicant requests the entry of the order in less than four months because Applicant is a small firm requiring the shorter interval.
10. The services rendered by Applicant were directly related and necessary to the preparation for and the administration of the Chapter 11 case.

11. HOURS OF SERVICES SORTED BY CATEGORY OR “NATURE” – The attorneys and clerks of Forrest L. Ingram, P.C. provided a total of 18.4 hours of services during the current period. The hours, broken down by natures are summarized in **Exhibit B**. They are as follows:

- a. **Admin** Approximately 1.5 hours of time and services were rendered in connection with matters that were administrative in nature including, but not limited to, corresponding with the Debtors regarding current issues in their case, and preparing correspondence on behalf of the Debtors. For these services, Applicant seeks \$322.50.
- b. **Adv** Approximately 0.9 hours of time and services were rendered in connection with Adversary Proceedings within the Debtors’ chapter 11 case, including, but not limited to, reviewing an adversary complaint, and preparing for hearings on an adversary matter. For these services, Applicant seeks \$427.50
- c. **CM** Approximately 4.3 hours of time and services were rendered in connection with contested matters, including, but not limited to, addressing state court matters and mechanic’s lien issues on the Debtors’ behalves. For such services, Applicant seeks \$1,075.00.
- d. **Disc** Approximately 0.5 hours of time and services were rendered in connection with discovery matters, including, but not limited to, reviewing and revising disclosures pursuant to Rule 26 for an adversary proceeding. For such services, Applicant seeks \$125.00

- e. **DS&P** Approximately 1.0 hours of time and services were rendered in connection with the Debtors' disclosure statement and plan, including, but not limited to, corresponding with the Debtors and other attorneys regarding the status of the Debtors' disclosure statement and plan of reorganization, and providing all services needed to obtain confirmation of the Debtors' disclosure statement and plan on March 31, 2011. For such services, Applicant seeks \$407.50.
- f. **Fee** Approximately 5.3 hours of time and services were rendered in connection with preparing Applicant's Fourth Application for Interim Compensation for professional services. For such services, Applicant seeks \$998.50.
- g. **Pre-Tr** Approximately 0.1 hours of time and services were rendered in connection with pretrial matters, including, but not limited to, conferencing with the Debtors regarding state court foreclosure actions. For such services, Applicant seeks \$47.50.
- h. **SalePP** Approximately 4.7 hours of time and services were rendered in connection with the sale of Debtors' personal property, including, but not limited to, reviewing and revising a motion for the sale of property under 11 U.S.C. § 363. For these services, Applicant seeks \$1,287.50.
- i. **Trste** Approximately 0.1 hours of time and services were rendered in connection with communicating with the United States trustee's office regarding the Debtors' monthly operating reports. For these services, Applicant seeks \$47.50.

12. HOURS OF SERVICES SORTED BY ATTORNEYS AND CLERKS – The attorneys

and clerks of Forrest L. Ingram, P.C. provided a total of approximately 18.4 hours of service, broken down by attorney, as indicated on **Exhibit C**. They are as follows:

- a. **Attorney Forrest L. Ingram** provided approximately 3.0 hours of service at \$475.00 per hour, including all phases of the Chapter 11 case.
- b. **Attorney Michael Ohlman** provided approximately 9.7 hours of service at \$250.00 per hour, including all phases of the Chapter 11 case.
- c. **Attorney Jack O'Connor**: provided approximately 4.9 hours of service at \$165.00 per hour, including the administrative phases of the Chapter 11 case.
- d. **Legal Clerk Andrew Meyer** provided approximately 0.8 hours of service at \$100.00 per hour, including the administrative phases of the Chapter 11 case.

13. Applicant's customary fee includes actual compensation for time and services, fixed overhead, salaries, and unallocable costs.

14. Applicant has also expended costs in providing services to Debtors. Such costs, including filing fees, postage and copying costs are set forth in **Exhibit E**, attached hereto. For such costs, Applicant seeks reimbursement in the sum of **\$5.10**

15. This Application and a Notice of Motion on the Final Application has been sent to the Debtors, to the U.S. Trustee, and to parties entitled to notice. A Notice of Hearing on this application has likewise been sent to all other creditors and parties of interest, along with a summary of all services provided by Debtors' counsel to the Debtors. A certificate of service for the Notice has been filed with the Clerk of the Court.

16. This Court has jurisdiction over the subject matter pursuant to 28 U.S.C. § 1334.

This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).

**WHEREFORE**, Applicant respectfully requests that the Court conduct an appropriate hearing on Counsel's application and allow a reasonable fee to Debtors' Counsel in the sum of **\$4,738.50** for services for the period from March 1, 2011 through March 31, 2011, plus costs of **\$5.10**, for a total of **\$4,743.60**. Applicant asks for such other relief as may be appropriate.

Respectfully submitted,

FORREST L. INGRAM, P.C.

/s/ Forrest L. Ingram  
Attorney for Debtors

Forrest L. Ingram, #3129032  
FORREST L. INGRAM, P.C.  
79 W. Monroe, Suite 900  
Chicago, IL 60603  
(312) 759-2838  
(312) 759-0298 fax